

# **Introduction to Hazardous Waste Regulations Webinar Series**

**Office of Environmental  
Assistance**

**Office of Waste  
Management and  
Radiological Protection**



# **Introduction to Hazardous Waste Regulations Webinar Series**

**Paperwork Requirements &  
What to Expect When  
The Inspector Arrives**



# Office of Environmental Assistance



**Jim Ostrowski**  
**Environmental Manager**  
**Training & Outreach Program**  
**Lansing**



# Office of Waste Management & Radiological Protection



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**Lansing**



# Housekeeping

- **All lines will be muted**
- **Questions can be sent to us via the question/chat box**
- **We will record webinar and post online**
- **Notes page**

# Environmental Assistance Center (EAC)

**Phone: 1-800-NO2-WASTE  
(1-800-662-9278)**

**Hours: 8:00 AM to 4:30 PM  
Monday – Friday**



## **Technical Assistance Services Include:**

**Air  
Waste  
Water**

**Environmental Audit Privilege  
Site Remediation  
Permit Coordination**





# **Do I Need to Know All of This?**

## **Hazardous waste regulations...**

**apply to all businesses, including  
municipalities, hospitals, & service  
industries, not just manufacturing  
industries**

**are written broadly to address hazards  
posed by all waste streams**





# Why Cover These Topics?

## Hazardous waste regulations require each business to...

Properly prepare, maintain, and have available at the time of inspection all documents required under RCRA and Part 111 rules.

Keep all documents on-site for a period of not less than 3 years from the last date of off-site shipment or on-site treatment or disposal.

# **Paperwork Requirements**

## **Paperwork Requirements Include:**

**Notification of Waste Activity (MI Site ID)**

**Waste Characterizations**

**Manifests and Shipping Records**

**Land Disposal Restriction Forms (LDRs)**

**Waste Area Inspection Documents**

**Biennial Reports**

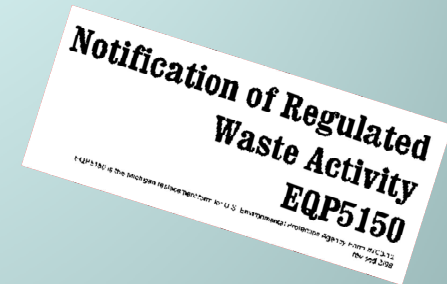
**Training Records**

**Contingency (Emergency) Plans**



# Notification of Hazardous Waste Activity

Generators must notify of regulated waste activity.



The Office of Waste Management and Radiological Protection (OWMRP) issues **SITE IDENTIFICATION NUMBERS** to facilities *per site*.

**Liquid Industrial Waste Generators must have an ID number!**

<small>Required under authority of the Natural Resources and Environment Protection Act, 1994 (PA 287). Failure to submit this information may result in civil or criminal penalties.</small>		<b>MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY</b> Waste and Hazardous Materials Division <b>DEQ</b>	
<b>SITE IDENTIFICATION</b>			
<b>I. The form is being submitted</b> <input type="checkbox"/> CHECK CORRECT (BORSTG) <small>If submitting a subsequent notification you can contact the MDEQ (BORSTG) District or Lansing office for a pre-populated form. For locations and phone numbers go to <a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a>.</small>		<input type="checkbox"/> as initial notification to notify as a new site or new owner for the site. Mail this form and the user charge fee with either a receipt from paying the \$10.00 fee on-line using a Master Card, VISA, or Discover Card or by check payable to the State of Michigan. Mail to: MDEQ Revenue Office - HRCOA, PO Box 30837, Lansing, MI 48909-8137. <b>OR</b> <input type="checkbox"/> as subsequent notification to change, update, or verify site information for an existing owner of a site with a previously issued site ID number. Mail directly to: BORSTG MDEQ at BORSTG MDEQ, Notification Unit, PO Box 30241, Lansing, MI 48909-7741. If a fee is not required. Otherwise submit to MDEQ Revenue Office (see above).	
		<b>AND ANY OF THE FOLLOWING</b> <input type="checkbox"/> as a component of a Hazardous Waste Permit Part A (submit to BORSTG MDEQ) <input type="checkbox"/> as a component of the Hazardous Waste (General) Report (submit to BORSTG MDEQ)	
<b>II. Site's ID Number</b>		A. Site's Identification (ID) Number	
<b>III. Name of Site</b>		A. Legal Company Name	
<b>TYPE OR PRINT CLEARLY</b>		B. Site Specific Name (BORSTG)	



# Manifest & Shipping Records

**Uniform Manifest must be used when hiring permitted & registered transporter to ship hazardous or liquid industrial waste to MI facilities except when:**

**SQG shipping waste off-site for reclamation and regenerated material is brought back to generator when specific conditions are met (tolling agreement)**

**Generator hauling  $\leq 55$  gallons of their own liquid industrial waste to designated facility with proper records**

**Transporter using consolidated manifest must provide company with a record of shipment with manifest number (keep copies at least 3 years)**



# Manifest & Shipping Records

## Generator must keep track of shipments and submittal of manifests.

**Manifest copies signed by the disposal facility should be sent back to the generator after date of shipment by:**

## CESQG or LIW

## 35 days: contact disposal facility

## 45 days: file report

# SQG

## 60 days: file report

# LQG

## 45 days: file report

[illegible]

# Hazardous Waste Manifests

## **RULE CHANGE!!**

**(Rule 306(1)(c))**

**Generator copies of the manifests for SQG and LQG hazardous waste do not need to be sent to the DEQ**

**For hazardous waste shipped out of state, generators remain responsible for ensuring that DEQ receives manifest copy with 3 signatures (TSD copy)**



# Liquid Industrial Waste Manifests

**No change in law for submittal of manifests.**

**Must submit copy of the manifest to DEQ by the 10<sup>th</sup> day after the end of the shipment month**

**Must track manifests to verify receipt of 3<sup>rd</sup> signature copy from designated facility within 35 days of shipment**

**Part 121 is currently being reviewed for change similar to HW manifest**





# **Land Disposal Restrictions (LDR)**

**(Rule 311 and 40 CFR 268)**

**Applies to listed & characteristic hazardous wastes from SQGs & LQGs**

**Notice sent to each TSD for each waste stating waste meets or does not meet LDR standards**

**Requires treatment before land disposal for most wastes**

**New LDR notification must be sent when there is a waste or facility change**



# **Land Disposal Restrictions (LDR)**

**(Rule 311 and 40 CFR 268)**

**To determine if treatment is required, review if waste codes for each waste stream meet the standards in 40 CFR 268.40, 268.45 (debris), or 268.49 (soil)**

**Notification required even for shipment to non-land based TSDs (e.g. incinerator)**

**Land disposal includes any disposal on land (landfill, land treatment, injection well, salt caverns, etc.)**



# **LDR Generator Recordkeeping Requirements**

**Keep LDRs & related documents for at least 3 years after waste last sent to TSDF**

**LDR's must have complete information such as categories of waste and underlying hazardous constituents**

**Information on LDR must be consistent with the waste characterization**

**On-site generator treatment to meet LDR criteria (40 CFR 268.48) requires a written plan describing the activities performed**



# **Hazardous Waste Biennial Report**

**(Rule 307)**

**Required of LQGs and TSDs**

**Submit by March 1 of even-numbered years**

**Report includes both MI and EPA hazardous wastes**

**Details hazardous waste activity in previous odd year**

**Keep copy at least 3 years from due date**



# Hazardous Waste Biennial Report

(Rule 307)

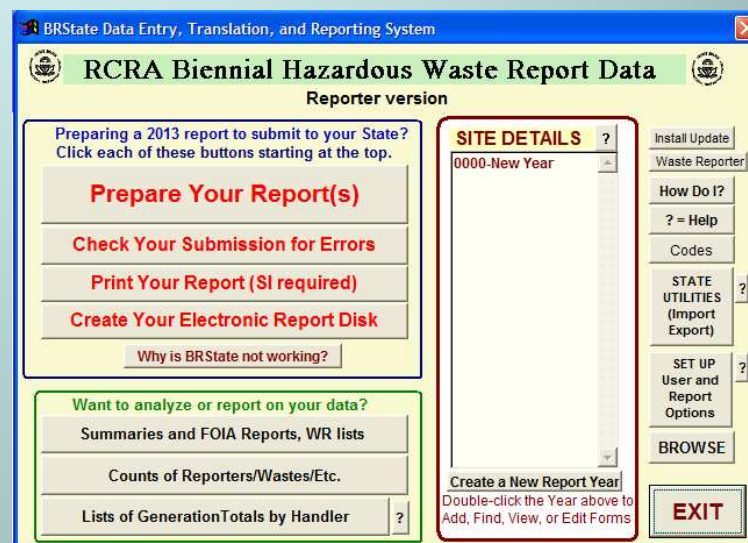
## IMPORTANT CHANGE!!

**OWMRP is not mailing out biennial packets in 2014**

**January 2014 electronic notification issued to required reporters encouraging electronic reporting**

**Download Florida's biennial reporting software (BRSW4) shown at right**

**Find more information at [www.michigan.gov/deq](http://www.michigan.gov/deq), search for "Biennial"**



**E-mail questions to [BiennialReport@michigan.gov](mailto:BiennialReport@michigan.gov)**



# Hazardous Waste Area Inspection Documents

**SQG & LQG must perform weekly container accumulation area inspections & each operating day for a hazardous waste storage tanks**

**LQGs must document hazardous waste container accumulation area & tank inspections**



REQUIRED WEEKLY HAZARDOUS WASTE MAINTENANCE INSPECTION CHECKLIST																				
MONTH: YEAR:																				
WEEK #	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4
Labeled																				
Dated																				
Containers Closed																				
Spills																				
Containment																				
Corrective Measures																				
Date																				
Initials																				

On the back, write comments on any areas below that were not in compliance (include the date).

- Labeled: Check that all drums and all other containers are properly labeled ("Hazardous Waste" and waste number).  
If satellite container, check if label has "Hazardous Waste" and either waste number or chemical name, or it can have both.
- Dated: Check to see if the container has the date listed when waste was first put in the container, and confirm the date on the container has not exceeded 90 days for Large Quantity Generator, or 180 days for Small Quantity Generator, which ever is applicable. If the date on the container has exceeded 90 days or 180 days, contact management.  
If it was a satellite container, check if the date was listed when the containers from that satellite area reached the maximum amount, either 55 gallons non acute, or 1 quart acute or severely toxic, hazardous waste.
- Containers Closed: Make sure that containers are closed (e.g., both bungs are in drums, drum ring top is secure, funnel tops closed, funnel valve closed, or tarp over roll-off box).
- Spills: Check that all containers are not leaking, bulged, or in poor condition. Are spills or staining present? If so, contact management.
- Containment: Make sure that there hasn't been any degradation to the secondary containment, (e.g., any cracks, is coating sufficient?)  
Is there enough set back distance of containers for squirt protection? Are all containers in the containment area?
- Corrective Measures: Are corrective measures needed and taken? Record details on the back.
- Date & Initials: Inspector dates and initials.

Revised 5/2008: Use of this DEQ WMMD checklist is optional, but Large Quantity Generators are required to have written inspection records and all others are



# Emergency Planning and Training Requirements

CESQG

SQG

## HAZARDOUS WASTE EMERGENCY INFORMATION

EMERGENCY NAME \_\_\_\_\_  
COORDINATOR PHONE \_\_\_\_\_  
ALTERNATE NAME \_\_\_\_\_  
PHONE \_\_\_\_\_  
FIRE DEPT. PHONE \_\_\_\_\_  
HOSPITAL PHONE \_\_\_\_\_  
POLICE PHONE \_\_\_\_\_

Fire alarm is located: \_\_\_\_\_  
\_\_\_\_\_

Spill control equipment is located: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Fire extinguishers are located: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Map of facility with emergency equipment, spill equipment, exit routes, and alarm locations.



National Response Center: 1-800-424-8802  
Michigan Pollution Emergency: 1-800-292-4706

Provided by: The Environmental Assistance Division and the Waste Management Division of the Michigan Department of Environmental Quality  
Environmental Assistance Center 1-800-662-9278

Other hazardous waste requirements may apply.





# Emergency Planning and Training Requirements

## LQG Employee Training Documents

- Must have written hazardous waste training program
- Must conduct annual training for employees
- Must keep written training records for 3 years
- Training must be conducted by someone qualified to give training
- Must have description of the *type of training given*

# Emergency Planning and Training Requirements

- Must have **CURRENT** & complete written contingency plan on-site
- Must make arrangements with fire dept., police, hospitals, emergency response contractors, and local emergency response teams and must have documentation that they were contacted

# Pre-Transport Requirements

**SQG & LQG offering 1,000 lbs. for shipment must have US DOT placards (for their type of waste) available for transporters [Rule 305(1)(e)]**



# **Tank Inspection Documents**

**All tank inspections must  
be documented and all records  
must be kept for at least 3 years**

# Tank Certification

**Must obtain a written assessment that is reviewed and certified by a qualified professional engineer that includes:**

- Design standards
- Hazard characteristics of the waste
- Determination performed by corrosion expert if the external shell of a metal tank is in contact with soil or water
- Design considerations if tank affected by vehicles

# **Tank Certification**

**Professional engineer written  
certification must be kept  
on file at facility**

# INSPECTION DAY!!





# **Inspection Day!!**

**When and why does an inspector visit?**

**Routine compliance inspection**

**Complaint received**

**Manifest discrepancies**

**Inspection requested by another agency**



# How To Survive An Inspection



**Relax!!**



**Don't be adversarial.**

**Have your records in order.**

**Don't try to hide anything.**

**If asked to "fix" something, consider  
doing it then if possible.**

# What Do Inspectors Look At?

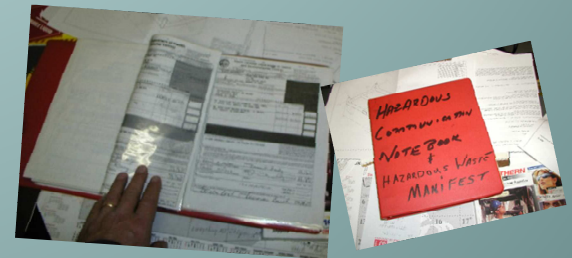
## Records:

**Waste Related** – waste characterizations, manifests, LDR's, storage area logs, biennial report

**Emergency Preparedness** – personnel training records, contingency plans, spill control equipment lists

## Waste Handling & Accumulation Areas:

Containers, tanks, labeling, secondary containment, work practices, emergency & communication equipment



# Gallery of Violations



# Manifest Common Violations

Please print or type. (Form designed for use on site (12-gibit) typewriter.)

**UNIFORM HAZARDOUS WASTE MANIFEST**

1. Generator ID Number: **000137379 GBF**

2. Generator's Name and Mailing Address:

3. Designated Facility Name and Site Address:

4. Manifest Tracking Number:

5. Generator's Phone:

6. Transporter 1 Company Name:

7. Transporter 2 Company Name:

8. Designated Facility Name and Site Address:

9. Facility's Phone:

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

11. Containers

12. U.S. EPA Waste Code

13. Special Handling Instructions and Additional Information

14. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/qualified, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment, I am the Primary Exporter. I certify that the contents of this manifest conform to the terms of the attached EPA Acknowledgment of Consent.

15. International Shipments

16. Transporter Acknowledgment of Receipt of Materials

17. Discrepancy

18. Designated Facility (or Generator)

19. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18b.

Using wrong ID number

Using wrong or incorrect waste codes

Failing to ensure that signed copy is sent to state (when required)

Failing to keep signed manifests for three years

Failing to have records of used oil shipped on consolidated manifest



# **LDR Common Violations**

**Failing to keep LDRs & related documents for at least 3 years after waste last sent to TSDF**

**Missing LDR notification and waste analysis documents**

**Missing or incomplete information such as categories, underlying hazardous constituents, and manifest numbers**

**Listing LDR information that is inconsistent with waste characterization**





# Other Common Document Violations

Failing to have waste characterizations on site for ALL WASTES

Failing to have copy of last Biennial Report on site (LQG)

Failing to have *updated* contingency plan on site (LQG)

Failing to have personnel training records on site (LQG)



# Common Storage Violations

**Don't stack more than 2 drums high**

**Leaning drum  
is a safety issue!**

**Failing to have  
adequate space or  
aisle width to properly  
inspect containers and  
provide access for  
emergency personnel**

**Failing to have labels  
visible for inspections**



# Common Storage Violations

- ☹ **Exceeding the allowable on-site accumulation time limit for hazardous waste without requesting an extension or obtaining a storage permit**



**Notice leaking drum and stains**

# Common Storage Violations



☹ **Leaving containers exposed to weather or vandals**



# Common Storage Violations



☹ **Failing to keep the containers closed, except when waste is added or removed**



# Common Storage Violations

- ☹ Leaving funnels in place that are not screwed into the bung and funnel not capable of being kept closed would be considered open



Valve must be closed except when adding waste.



Notice the splashing on wall





# Compliant Closure Options



Lockable option

Notice the valve, it automatically closes when handle is released



# Storage Container Labeling Violations

- ☹ **Listing incorrect or incomplete information on hazardous waste labels**



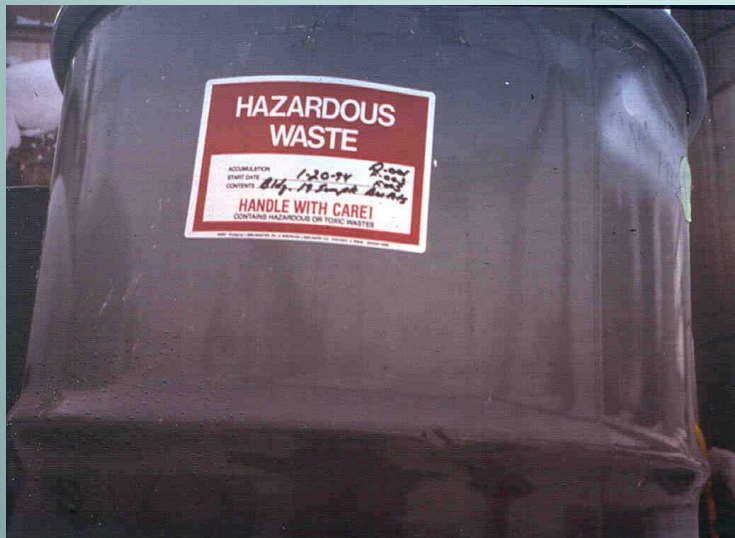
**Missing the accumulation date**

**Missing the words "Hazardous Waste"**

**Missing the hazardous waste number(s)**



# Compliant Storage Labeling



Accumulation Label

HAZARDOUS WASTE		
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL		
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY		
GENERATOR NAME _____	EPA # _____	
ADDRESS _____	CITY _____	STATE _____ ZIP _____
EPA DOT SHIPPING DESCRIPTION (PROPER SHIPPING NAME — UNNA NO. — CONSTITUENTS OR EPA WASTE CODE/CHARACTERISTIC)		
_____		
_____		
DATE OF FINAL ACCUMULATION _____	SATELLITE ACCUMULATION _____	EMERGENCY RESPONSE GUIDE # _____
WHEN HANDLING OR DURING ROUTINE OR EMERGENCY EXPOSURE TO THE HAZARDOUS WASTE IN THIS CONTAINER, USE THE SAFETY EQUIPMENT CHECKED BELOW:		ACCEPTANCE AT TSDF _____
<input type="checkbox"/> Hard Hat	<input type="checkbox"/> Respiratory Protection	REPORTABLE QUANTITY "RQ" IN POUNDS "RQ" _____ LBS.
<input type="checkbox"/> Safety Glasses	<input type="checkbox"/> Air-Purifying Respirator	
<input type="checkbox"/> Safety Goggles	Type _____	MANIFEST DOCUMENT # _____
<input type="checkbox"/> Full Face Shield	<input type="checkbox"/> Fully Encapsulated Suit	
<input type="checkbox"/> Protective Gloves	<input type="checkbox"/> Atmosphere Supplying Respirator	IN THE EVENT OF A SPILL OF THIS HAZARDOUS WASTE, CONTACT THE U.S. COAST GUARD NATIONAL RESPONSE CENTER AT 800-424-6862 FOR INFORMATION AND ASSISTANCE AND THE 811 EMERGENCY PHONE OR THE LOCAL OPERATOR IN THE COMMUNITY WHERE SPILL TOOK PLACE.
<input type="checkbox"/> Splash Apron	Type _____	
<input type="checkbox"/> Protective Boots		
© 1994 HAZARDOUS MATERIALS PUBLISHING CO. • (610) 683-6721 • KUTZTOWN, PA 19530		

Shipping Label

# Common Storage Violations

## ☹ Using Containers in Poor Condition



Some bad containers are obvious!

Leaking tank





# Common Storage Violations



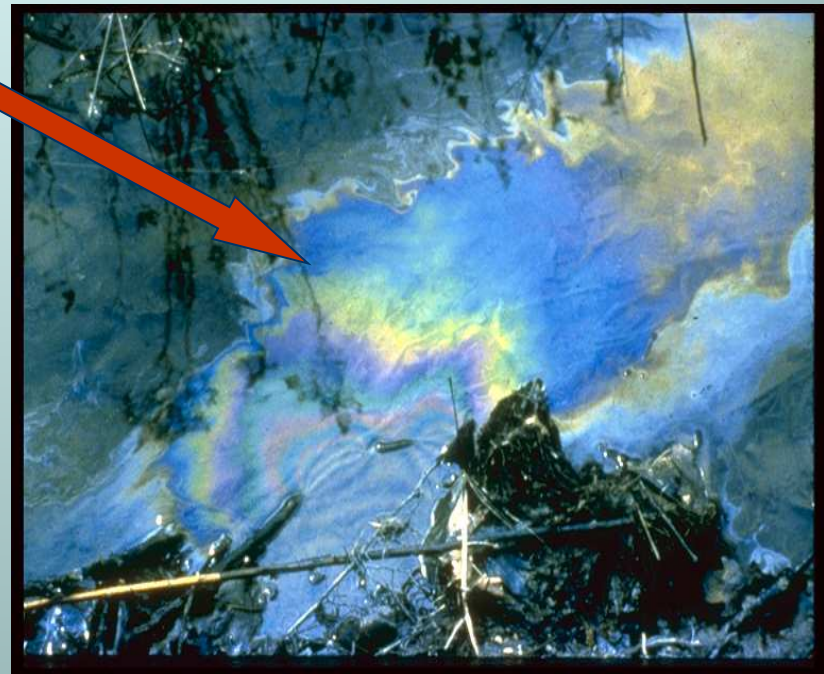
Others require looking  
all around the container  
to see a problem

Look for staining  
as a sign



# Common Storage Violations

Other leaks require noticing signs on the ground or puddles, etc.





# Compliant Used Oil Storage

## Compliant Used Oil Oil Labeling



# Common Storage Violations

## Illegal Disposal of Used Oil





# Common Secondary Containment Violations



- ☹ **Lacking or inadequate secondary containment for LQG, SQG with over 2200 lbs. & any facility storing acutely hazardous wastes**



# Common Secondary Containment Violations

☹️ **Failing to have containers elevated or base of containment sloped to drain when required**

☹️ **Lacking or inadequate squirt protection**

**Notice the staining**



**Sill is not high enough**

# Common Secondary Containment Violations



☹ **Lacking or inadequate chemical resistant coating & having cracked surfaces**





# Common Secondary Containment Violations



☹️ **Failing to remove precipitation in a timely manner from containment areas**

**How can drums be checked for leaks if buried in snow?**

# Compliant Secondary Containment Options



Sloping ramp saves backs and reduces spills when moving materials in & out of containment area

Spill pallets OK for solids but **DOES NOT** provide squirt protection for liquids



This type **DOES** provide squirt protection



# Sorbents



Sorbents used to clean up hazardous waste by SQG or LQG *must* be handled as hazardous waste

Can be landfilled IF:  
don't contain free liquids, AND  
not a hazardous waste, OR  
were generated by CESQG





# What Kind of Inspection Follow-up Is Necessary?



**Respond according to the letter sent by the OWMRP.**

**Accompany inspector if there is a follow-up second inspection.**

**Have a question about the inspection? Call the inspector who visited your facility.**

**Have general waste question?  
Call the Environmental Assistance Center 800-662-9278.**



# MDEQ Hazardous Waste Generator Webinar - Self Certification

MDEQ Hazardous Waste Generator Webinar Trainer - Self Certification	
I, _____ <small>Print signatory's name here</small>	
certify that I have viewed the entirety of the Michigan Department of Environmental Quality (MDEQ), Hazardous Waste Webinars listed below, for which I am a signatory, to gain a general understanding of the hazardous waste generator requirements under Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, Act 451 of 1994, as amended, and the rules promulgated thereunder. I further certify that I recognize that this information is general and it is essential for me to evaluate the need for additional site-specific training as part of a site-specific hazardous waste training program. I recognize that additional site-specific training is necessary to develop such a hazardous waste program for my facility and for me to be qualified to provide such training to on-site personnel to perform daily duties related to the generation and management of hazardous waste.	
<b>Introduction to Hazardous Waste Regulations: Waste Characterization and Generator Status</b>	
Signature _____	Date Training Viewed _____
<b>Introduction to Hazardous Waste Regulations: Hazardous Waste Generator Accumulation, Storage, and Labeling Requirements</b>	
Signature _____	Date Training Viewed _____
<b>Introduction to Hazardous Waste Regulations: Hazardous Waste Generator Recordkeeping &amp; Inspection</b>	
Signature _____	Date Training Viewed _____

April 10, 2012





# Questions

**Feel free to ask questions via your  
question/chat box**

# Upcoming Events

- **Jan-Feb** – MAERS and SARA Workshops
- **March 18 & 20** – Fugitive Dust Workshops
- **May 8-9** – Green Infrastructure Conference
- **May-June** – Michigan Environmental Compliance Conference
- **June 24 & 26** – Advanced Waste Characterization Workshop



[www.michigan.gov/deqworkshops](http://www.michigan.gov/deqworkshops)

**THANK YOU  
FOR PROTECTING  
MICHIGAN'S  
ENVIRONMENT!**